

## **EXHIBIT A**

---

## AFFIDAVIT AND DECLARATION OF PAUL SCHWARTZ

---

Affiant and Declarant Paul Schwartz, being first duly sworn, deposes and states under penalty of perjury under the laws of the United States of America and the State of Michigan that the foregoing is true and correct:

1. I am an individual at least 18 years of age and competent to testify to the matters set forth herein.
2. I have personal knowledge of the matters stated in this affidavit and if called to testify I will attest that the facts stated are true.
3. This affidavit is executed in relation to the matter of *In re Lansing Community College Data Breach Litigation*, Case Number 1:23-cv-00738-PLM-RSK, currently pending in the United States District Court for the Western District of Michigan and assigned to the Honorable Paul L. Maloney.
4. I am currently the Director of Information Security for Lansing Community College (“LCC”).
5. I have been an employee of LCC since November 2014 and have been in my current position for almost nine years.
6. I have a Bachelors of Science degree in Computer Science from Iowa State University.
7. I have a Masters of Science degree in Human Resource Management and Services from Troy University.
8. I have a Masters of Business Administration from Webster University.

9. I have numerous technical certifications, such as: Cisco Certified Network Associate (“CCNA”) Cyber Ops; Certified Information Systems Security Professional (“CISSP”) (ISC); Network+ (CompTIA), and Security+ (CompTIA).
10. I have been in the information security field for over 20 years.
11. Before my career in information security, I was a Communications Officer in the United States Air Force from 1994 to 2014.
12. As a Communications Officer, I spent 10 years on the technical side of information technology and an additional 10 years focused on leadership and management.
13. I served as the Chief of Staff for the NATO Communications and Information Agency (“NCI Agency”). There, I directly synchronized all the enabling functions for their 130-person organization to include human resources, logistics, resource management, customer service management, projects, and training. In this role, I oversaw the implementation and reform of key policies and directives required to meet customer demands efficiently and effectively. Ultimately, I was awarded “Executive of the Year” Award for my efforts.
14. I was employed as a Professor and Department Chair of Aerospace Studies at the University of Minnesota from 2011 to 2013.
15. On or about December 25, 2022, LCC’s computer networks were attacked (“Cybersecurity Incident”) by a Threat Actor (“TA”).
16. TAs are sometimes known and referred to as “hackers.”
17. LCC’s security team discovered the intrusion into the network and took action to remove the threat and secure its network.
18. Thereafter, LCC engaged numerous professionals to assist in its investigation and eventual notification efforts.

19. There is no evidence indicating that any Personal Identifiable Information (“PII”), of the named plaintiffs or any other persons, was exfiltrated from LCC’s computer networks before, during, or after the Cybersecurity Incident.
20. The TA has not attempted to hold any PII “hostage” or for “ransom.”
21. The TA has not demanded any form of payment from LCC for the Cybersecurity Incident.
22. There is no evidence that any of the named plaintiffs or any other persons’ PII has appeared on the internet or the “dark web,” either for free or being offered for sale as a result of the Cybersecurity Incident.
23. Following LCC’s investigation, on or about June 30, 2023, LCC sent out over 700,000 notification letters via First Class U.S. Mail to persons potentially affected by the Cybersecurity Incident.
24. LCC also posted a public notice on its website related to the Cybersecurity Incident on June 29, 2023, which is accessible (with updates) at <https://www.lcc.edu/alert.html> (last accessed October 4, 2023).
25. On or about June 30, 2023, LCC notified state (or territory) regulators in Arizona, California, Colorado, Connecticut, Washington D.C., Florida, Illinois, Indiana, Louisiana, Massachusetts, Maryland, Maine, Montana, North Carolina, New Hampshire, New Jersey, New York, Oregon, Puerto Rico, Texas, Virginia, Vermont, and Washington.
26. Also, on or about June 30, 2023, LCC notified three credit bureaus of the Cybersecurity Incident: Equifax, Experian, and Transunion.
27. LCC has proactively offered those potentially affected by Cybersecurity Incident numerous protections, without charge, such as single bureau credit monitoring; fraud consultation; and identity theft restoration services.

28. Further Affiant sayeth not.

/s/ Paul Schwartz Executed On: 11 Oct 2023  
Paul Schwartz  
Affiant and Declarant

STATE OF MICHIGAN )  
                      ) s.s.  
COUNTY OF Ingham )

Subscribed and sworn by Paul Schwartz before me this 11<sup>th</sup> day of October, 2023, in  
Ingham County, State of Michigan.

/s/ Melissa K Quesada  
Printed Name: Melissa K. Quesada  
Notary Public, State of Michigan, County of Ingham.  
My commission expires 8/15/2025.  
Acting in the County of Ingham, State of Michigan.

19819:00322:7315824-1

MELISSA K QUESADA  
Notary Public-State of Michigan  
County of Ingham  
My Commission Expires Aug. 15, 2025  
Acting in the County of Ingham